

Ob)

MICHAEL S. ACKERMAN
MA 2134

XCA L 46293-1/jo
ZUCKER, GOLDBERG & ACKERMAN
Attorneys for Secured Creditor
WELLS FARGO HOME MORTGAGE, INC.
1139 Spruce Drive
P.O. Box 1024
Mountainside, New Jersey 07092-0024
1-908-233-8500

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN THE MATTER OF:

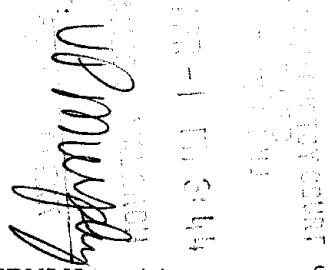
CHAPTER 13

VICTOR RAIMO SR.

: CASE NO. 02-52305 (RTL)
: AMENDED NOTICE OF
: OBJECTION TO PLAN

DEBTOR.

: CONFIRMATION HEARING:
: 7/16/02 @ 9:00 AM


The undersigned, ZUCKER, GOLDBERG & ACKERMAN, attorneys for
Secured Creditor WELLS FARGO HOME MORTGAGE, INC., hereby amends its
objection to the Debtor's Chapter 13 Plan on the following grounds:

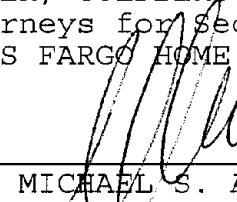
1. The Secured Creditor has filed a claim for arrearages in the amount of \$40,903.35.

2. The Debtor's plan provides for monthly Trustee distributions of \$417.

3. The Debtor's proposed plan will satisfy the Secured Creditor's claim within 104 months.

4. The Secured Creditor objects as the plan's duration is in excess of 60 months, in violation of 11 U.S.C. 1322(d) and the Debtor's plan is not feasible in violation of 11 U.S.C. 1325(a)(6).

ZUCKER, GOLDBERG & ACKERMAN
Attorneys for Secured Creditor
WELLS FARGO HOME MORTGAGE, INC.


MICHAEL S. ACKERMAN
MEMBER OF THE FIRM

DATED: March 28, 2002

**THIS IS AN ATTEMPT TO COLLECT A DEBT.
ANY INFORMATION OBTAINED
WILL BE USED FOR THAT PURPOSE.**

ZUCKER, GOLDBERG & ACKERMAN

LEONARD B. ZUCKER
 MICHAEL S. ACKERMAN
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FOUNDED IN 1923
 AS ZUCKER & GOLDBERG

MAURICE J. ZUCKER (1918-1979)
 LOUIS D. GOLDBERG (1923-1967)
 LEONARD H. GOLDBERG (1929-1979)
 BENJAMIN WEISS (1949-1981)

- Of Counsel -
 ROSALIND M. KENDELLEN
 HOWARD R. BERMAN

XCA L 46293-1

March 28, 2002

Clerk, U.S. Bankruptcy Court
 402 E State St, Room 3 4th Floor
 Trenton, NJ 08608

Re: Victor Raimo Sr.
 Loan No.: 8401921
 Case No.: 02-52305 (RTL)
 Premises: 469 Route 72
 Barnegat, NJ 08005
 Secured Creditor: WELLS FARGO HOME MORTGAGE, INC.

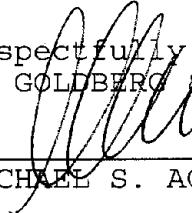
Dear Sir:

Relative to the above noted bankruptcy filed in your office, this office represents WELLS FARGO HOME MORTGAGE, INC., the secured creditor in the above matter.

At the request of our client, we enclose herewith an original and two (2) copies of an Amended Notice of Objection.

Please file the original in your office, note date of filing on the copies and return said extra copy to this office in the envelope enclosed.

Respectfully yours,
 ZUCKER, GOLDBERG & ACKERMAN

By: 
 MICHAEL S. ACKERMAN

MSA/jo
 Enclosures

cc: Victor Raimo, Esq.
 Robert M. Wood, Chapter 13 Trustee
 Victor Raimo Sr.

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 WILL BE USED FOR THAT PURPOSE.

